

March 20, 2020

Project No. 913-1101-020.001.1G

**Neal Conor**

U.S. Environmental Protection Agency, Region 10  
1200 Sixth Avenue, Suite 155  
Seattle, WA 98101-3123

**RESPONSE TO U.S. ENVIRONMENTAL PROTECTION AGENCY COMMENTS ON “DRAFT 2018 SUMMARY REPORT ON GROUNDWATER CONDITIONS, MONSANTO SODA SPRINGS, IDAHO PLANT” JUNE 21, 2019**

Dear Mr. Conor:

On July 26, 2019, the United States Environmental Protection Agency (EPA) issued comments on the report titled *Draft 2018 Summary Report on Groundwater Conditions, Monsanto Soda Springs Idaho Plant*<sup>1</sup>, dated June 21, 2019. This letter provides responses to EPA's comments. A revised report has been prepared incorporating the comments and is attached.

**1.0 SPECIFIC COMMENTS**

**Comment:** *Section 4.2.1.3, page 22. Text states “TW-91 was drilled in UBZ-3 on the South Plant Fence line on the east side of the Primary Fault, between TW-11 and 12 and TW-81 (Figure 2) in order to determine whether constituents from source(s) in the UBZ-4 were not being captured [italics added] by the Plant Production Wells and were flowing southward from the Monsanto Plant in the UBZ-3”. Reword to clarify, for example “...to determine whether or not constituents are being captured...”*

**Response:** This sentence has been reworded as requested.

**Comment:** *Table 9a: Make COC exceedances of RGs in **Bold**.*

**Response:** Table 9a (and Table 9b) have been updated to show exceedances of the respective RGs in bold for reference.

**Comment:** *Figure 8: Change the “2nd” 5890 contour in UBZ-2 to 5880.*

**Response:** Figure 8 (and Figure 9) have been updated as requested.

---

<sup>1</sup> Golder. 2019. Groundwater and Surface Water Sampling Work Plan, Bayer Company Soda Springs Idaho Plant. April 22.


Please contact us if you have any questions or need additional information.

Sincerely,

**Golder Associates Inc.**



Michael Klisch, LHG  
*Senior Project Hydrogeologist*



David Banton, LHG, RG  
*Principal Hydrogeologist*

MK/DB/ks

CC: Jason Maughan, Monsanto Co, c/o P4 Production LLC  
Randy Cooper, Bayer  
Stan Christensen, Idaho Department of Environmental Quality

Attachments: 2018 Summary Report on Groundwater Conditions, Monsanto Company,  
Soda Springs, Idaho Plant

v:\projects\1991 projects\913-1101x020 monsanto 2019 hydrogeology support\001\_annual gw&sw sampling\2018 final wq report\revised final oct 2019\9131101020-rev0-2018 wq report\_epa comment response-032020.docx